

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

MIRKO AVESANI,

Petitioner,

CASE NO.

v.

GOOGLE LLC d/b/a YOUTUBE

Respondent.

C. Christopher Newberg (P79025)
RODENHOUSE LAW GROUP P.C.
Attorney for Petitioner
678 Front Avenue NW, Suite 176
Grand Rapids, MI 49504
(616) 451-4000
chris@rodenhouselaw.com

SUBPOENA TO GOOGLE LLC D/B/A YOUTUBE PURSUANT TO 17 U.S.C. § 512(H)

Petitioner, Mirko Avesani, by and through his undersigned counsel of record, hereby requests that the Clerk of this Court issue a subpoena to Google LLC d/b/a YouTube to identify alleged infringers at issue, pursuant to the Digital Millennium Copyright Act (“DMCA”), 17 U.S.C. § 512(h) (the “DMCA Subpoena”). The proposed DMCA Subpoena is attached hereto as **Exhibit 1.**

The DMCA Subpoena is directed to Google LLC d/b/a YouTube, the internet service provider to which the user and/or YouTube channel, “Tim Connelly,” posted content that infringes on copyrights held by Petitioner.

Petitioner has satisfied the requirements for the issuance of a subpoena pursuant to 17 U.S.C. § 512(h) by submitting the following documents with this request:

1. The proposed DMCA Subpoena (with cover letter), attached as **Exhibit 1**;
2. A copy of the notification described by 17 U.S.C. § 512(c)(3)(A), attached as **Exhibit 2**;
3. A sworn declaration to the effect that the purpose for which the subpoena is sought is to obtain the identity of an alleged infringer and that such information will only be used for the purpose of protecting rights under the DMCA signed by Mirko Avesani, attached as **Exhibit 3**; and
4. A sworn declaration to the effect that the purpose for which the subpoena is sought is to obtain the identity of an alleged infringer and that such information will only be used for the purpose of protecting rights under the DMCA signed by C. Christopher Newberg, attached as **Exhibit 4**.

Because Petitioner has complied with the statutory requirements, Petitioner respectfully requests that the Clerk expeditiously issue and sign the proposed DMCA Subpoena, pursuant to 17 U.S.C. 512(h)(4).

Respectfully submitted,

RODENHOUSE LAW GROUP, P.C.

Date: March 30, 2021

/s/ C. Christopher Newberg
C. Christopher Newberg (P79025)
Attorney for Petitioner
678 Front Ave. NW, Suite 176
Grand Rapids, MI 49504
Phone: (616) 451-4000
Email: chris@rodenhouselaw.com